



Meghan Chrisner-Keefe  
Attorney At Law  
MCK@smitheibeler.com  
www.SmithEibeler.com  
tel. 732.444.1300  
fax. 732.444.1096

August 24, 2023

**Via ECF**

So Ordered this  
25th Day of August, 2023.

Hon. J. Brendan Day, U.S.M.J.  
United States District Court, District of New Jersey  
402 E. State Street, Court Room 7E  
Trenton, NJ 08608

A handwritten signature in blue ink, appearing to read 'JBD', is written over a horizontal line.

J. BRENDAN DAY  
UNITED STATES MAGISTRATE JUDGE

**Re: Elise Lawless v. Hashoff, LLC, et al.**  
**Case No: 3:23-cv-02334-PGS-JBD**

Dear Judge Day:

This office represents Plaintiff, Elise Lawless. This letter is written jointly with counsel for Defendant TriNet HR III, Inc. and counsel for Defendant Phil Frank, to request an extension of the dates and timeframes set forth in Your Honor's August 3, 2023 Interim Scheduling Order.

On July 31, 2023, the parties appeared before Your Honor for a Case Management Conference. At that time, Your Honor Ordered the following:

- By August 31, 2023, Plaintiff shall provide defendants with a proposed Amended Complaint,
- By September 14, 2023 Defendants shall advise Plaintiff whether they consent to the filing of the Amended Complaint,
- By September 22, 2023 Plaintiff's counsel shall either file the Amended Complaint or advise the Court of Defendants' objection thereto and provide a proposed briefing schedule for a Motion to Amend, and
- The Court further instructed the parties to engage in preliminary discovery to the extent practicable.

The parties are exploring the prospect of resolution. In an effort to focus their time and resources on settlement discussions, the parties jointly request an extension of the above-referenced dates by three (3) additional weeks. The requested extension will not impact the telephone status conference scheduled for October 17, 2023.

Hon. J. Brendan Day, U.S.M.J.

August 24, 2023

Page 2

Should Your Honor grant the within extension, the new dates will be as follows:

- By September 21, 2023, Plaintiff shall provide defendants with a proposed Amended Complaint,
- By October 5, 2023 Defendants shall advise Plaintiff whether they consent to the filing of the Amended Complaint,
- By October 13, 2023 Plaintiff's counsel shall either file the Amended Complaint or advise the Court of Defendants' objection thereto and provide a proposed briefing schedule for a Motion to Amend, and
- Discovery deadlines shall be set at the October 17, 2023 status conference.

Should the Court require additional information concerning the foregoing, please do not hesitate to contact us. Thank you for Your Honor's consideration to this request.

Respectfully submitted,

SMITH EIBELER, LLC

/s/ Meghan Chrisner-Keefe  
MEGHAN CHRISNER-KEEFE

MCK/tcd

cc: All Counsel of Record